

Judge Kathleen Cardone

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

**SEALED**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH PAUL TAYLOR,

Defendant.

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CRIMINAL NO. EP-12-CR-\_\_\_\_\_

**VIOLATIONS:**

**CTS 1 & 2:** 18 U.S.C. § 1030 – Fraud and  
Related Activity in Connection with  
Computers  
**CT 3:** 18 U.S.C. § 1001 False Statement  
**Notice of Government's Demand for**  
**Forfeiture**

**EP 12CR0707**

THE GRAND JURY CHARGES:

**COUNT ONE**

(18 U.S.C. §§ 1030(a)(5)(A) and (c)(4)(B))

On or about the April 28, 2010, within the Western District of Texas, the Northern District of California, and elsewhere, the defendant,

**JOSEPH PAUL TAYLOR,**

knowingly caused the transmission of a program, information, code, and command, and, as a result of such conduct, intentionally caused damage without authorization to protected computers, and the offense caused loss to persons during a 1-year period from the defendant's course of conduct affecting protected computers aggregating at least \$5,000 in value, in violation of 18 U.S.C. §§ 1030(a)(5)(A) and (c)(4)(B).

**COUNT TWO**

(18 U.S.C. §§ 1030(a)(5)(B) and (c)(4)(A))

On or about April 28, 2010, in the Western District of Texas, the Northern District of California, and elsewhere, the defendant,

**JOSEPH PAUL TAYLOR,**

intentionally accessed protected computers without authorization, and as a result of such conduct, recklessly caused damage, and the offense caused loss to persons during a 1-year period from the defendant's course of conduct affecting protected computers aggregating at least \$5,000 in value, in violation of 18 U.S.C. §§ 1030(a)(5)(B) and (c)(4)(A).

**COUNT THREE**

(18 U.S.C. § 1001(a)(2))

On or about May 26, 2011, in the Western District of Texas, the defendant,

**JOSEPH PAUL TAYLOR,**

in a matter within the jurisdiction of the United States Department of Justice, Federal Bureau of Investigation, a part of the Executive Branch of the Government of the United States, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in that Defendant, falsely represented to Agents of the Federal Bureau of Investigation, that he did not know a password used to commit a computer intrusion, when in truth and in fact, Defendant knew that the password as it was located in his computer pursuant to a computer forensic exam, and Defendant's false statements were attempts to avoid extensive investigation of his computer and questioning by Agents of the Federal Bureau of Investigation, regarding the computer intrusion, in violation of Title 18, United States Code, Section 1001(a)(2).

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**

(18 U.S.C. § 982(a)(2)(B))

Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 1030 charged in Counts One and Two of this Indictment, the defendant,

**JOSEPH PAUL TAYLOR,**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offenses, including but not limited to a sum of money in United States currency which represents the amount of proceeds generated by the offense.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

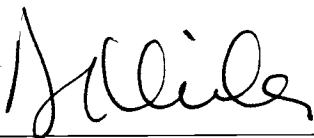
A TRUE BILL.

ORIGINAL SIGNATURE  
REDACTED PURSUANT TO  
E-GOVERNMENT ACT OF 2002

FOREPERSON OF THE GRAND JURY

ROBERT PITMAN  
UNITED STATES ATTORNEY

BY:

  
Assistant U.S. Attorney